

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Lonnie Thompson,	:	Case No. 1:23-cv-1656
	:	
Plaintiff,	:	Judge Pamela A. Barker
	:	
v.	:	Magistrate Judge James E. Grimes, Jr.
	:	
Julia A. Hensley, et al.,	:	
	:	
Defendants.	:	

**DEFENDANTS’ RESPONSE TO PLAINTIFF’S MOTION FOR A 90-DAY EXTENSION
OF CASE MANAGEMENT CONFERENCE DEADLINES
(ECF NO. 66)¹**

On April 18, 2025, Plaintiff Lonnie Thompson (“Plaintiff”) filed a motion seeking to extend by ninety days each of the deadlines previously agreed upon by counsel at the January 21, 2025 status conference of this matter (ECF No. 58), namely a fact discovery cut-off date of May 1, 2025, an expert discovery cut-off date of June 2, 2025, a cut-off date for rebuttal expert reports of July 2, 2025, and a motion for summary judgment cut-off date of August 1, 2025. The Plaintiff’s reason for seeking further modification of the Case Management Schedule is the purported lack of communication between him and his appointed counsel, who has since been dismissed and terminated from this case. ECF No. 66, PageID 465. Although the Plaintiff claims he is now at a disadvantage in prosecuting this action, ECF No. 66, PageID 464, the hindrance he alleges is due to his own unwillingness to abide by his appointed counsel’s advice. ECF No. 66-4.

While Plaintiff failed to afford Defendants Hansely, Newland, Ojukwu, Cardaras, Cornwell, and Wheeler (“Defendants”) any opportunity to voice their opposition to the above-referenced extension request before it was filed, the Court has since remedied this failure by

¹ Plaintiff’s Motion for Extension of Time (ECF No. 65) was amended to correct typographical errors and refiled as ECF No. 66. See ECF No. 66-1, Letter to Clerk. The substance of both motions is the same.

allowing Defendants seven days within which to do so. *See* April 18, 2025, Non-document Order. Since the fact discovery deadline is a mere nine days out, Defendants would be prejudiced by allowing Plaintiff any extension of time at this late date. Nevertheless, if Defendants are accorded an extension of an equivalent number of days on any continuance Plaintiff is granted, they will agree not to oppose the request. In other words, if Plaintiff is granted until August 1, 2025, to complete fact discovery, the expert discovery deadline should be moved to September 1, 2025, the deadline for rebuttal expert reports should be moved to October 1, 2025, and the summary judgment deadline should be moved to November 1, 2025.

Respectfully submitted,

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Ohio Attorney General

s/ Mindy Worly
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Trial Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Defendants' Response to Plaintiff's Motion for a 90-Day Extension of Case Management Conference Deadlines*, was filed electronically in the Court's ECF system on April 21, 2025. Notice of this filing has been sent to *pro se* Plaintiff via prepaid, U.S. Mail at the following address:

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Richland Correctional Institution
P.O. Box 8107
Mansfield, OH 44901

s/ Mindy Worly
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